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November 19, 2024

**Via ECF**

Hon. Ronnie Abrams  
U.S. District Court  
Southern District of New York  
40 Foley Square, Room 2203  
New York, NY 10007

Re: *Neil Zlozower v. Meredith Operations Corporation d/b/a Dotdash Meredith*  
Case No: 1:24-cv-07468-RA

Dear Judge Abrams:

We are the attorneys for plaintiff Neil Zlozower (“*Plaintiff*”) on the above-captioned matter. Pursuant to Section 1(D) of Your Honor’s Individuals Rules & Practices, we write to respectfully request an adjournment of the initial conference date, currently scheduled for December 6, 2024, [Dkt. No. 8], and extension of the associated filing deadlines.

The current deadline for defendant Meredith Operations Corporation d/b/a Dotdash Meredith (“*Defendant*”) to file its Answer or otherwise respond to the Complaint is December 23, 2024. [Dkt. No. 10]. As such, the Plaintiff respectfully requests that the Initial Conference, currently scheduled for December 6, 2024, along with the associated filing deadlines, be adjourned and extended for thirty (30) days, to January 22, 2025, or to an alternative date following the Defendant’s December 23, 2024, filing deadline.

This is Plaintiff’s first request for an adjournment of the Initial Conference and as such, no previous requests were granted or denied. This request is made in good faith, not for purposes of delay, and granting this request will not prejudice any party in this matter. Good cause exists for the instant request as counsel for Defendant has not yet filed an appearance on this matter, and the adjournment and extension would permit the parties time to competently discuss the required topics under Rule 26(f) and the most appropriate case management plan based on Defendant’s response to the Complaint. Further, the additional time would enable the parties to discuss the possibility of early resolution. Defendant consents to the requested relief.



Thank you for your consideration of this request.

Respectfully submitted,

**SANDERS LAW GROUP**

/s Jaymie Sabilia-Heffert  
Jaymie Sabilia-Heffert, Esq.

cc: All counsel of record via ECF

Application granted. The conference previously scheduled for December 6, 2024 is hereby adjourned to January 24, 2025 at 2:00 p.m. The parties shall file a joint letter and proposed case management plan and scheduling order no later than January 17, 2025. *See* ECF No. 8.

SO ORDERED.

A handwritten signature in blue ink, appearing to be "Ronnie Abrams", written over a horizontal line.

Hon. Ronnie Abrams  
November 20, 2024